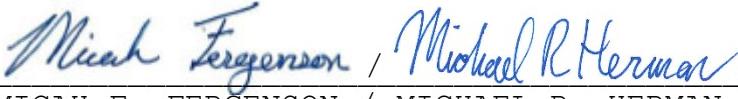


Approved: 
MICAH F. FERGENSON / MICHAEL R. HERMAN
Assistant United States Attorneys

Before: THE HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

- - - - - x **22 MAG 934**

UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
- v. -	:	Violation of
BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINES, and WILLIAM DRAYTON,	:	21 U.S.C. § 846
	:	COUNTY OF OFFENSE:
	:	NEW YORK
Defendants.	:	
	:	

- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

SAMANTHA GILL, being duly sworn, deposes and says that she is a Detective with the New York City Police Department ("NYPD"), and charges as follows:

COUNT ONE
(Narcotics Conspiracy Resulting in Death)

1. From at least in or about 2020, up to and including in or about 2021, in the Southern District of New York and elsewhere, BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINES, and WILLIAM DRAYTON, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINES, and WILLIAM DRAYTON, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINES, and WILLIAM DRAYTON, the defendants, conspired to distribute and possess with intent to distribute were: (i) mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (ii) mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

4. The use of such controlled substances, which had been distributed by BILLY ORTEGA, a/k/a "Jason," and KAYLEN RAINES, the defendants, on or about March 17, 2021, resulted in the deaths of Julia Ghahramani, Amanda Scher, and Ross Mtangi.

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

5. I am a Detective with the NYPD. I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, witnesses and others, as well as my examination of physical evidence, reports, and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. Based on my participation in this investigation, including my personal observations; my review of documents, records, photographs, and videos; my examination of physical evidence; my participation in physical surveillance; and my discussions with other law enforcement officers and witnesses, I have learned the following, in substance and in part:

Overview

a. From at least in or about 2020, to at least in or about 2021, BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINES, and WILLIAM DRAYTON, the defendants, and others known and unknown, operated a narcotics delivery service (the "Delivery Service") in this District. I know from my experience as a narcotics detective that individuals who are engaged in narcotics trafficking through a delivery business involving multiple customers commonly use one

or more couriers or delivery persons, with one or more central contacts coordinating the deliveries and/or supplying the narcotics. ORTEGA was the central contact who, like a dispatcher, coordinated the deliveries with his couriers and his customers. RAINY and DRAYTON were two of ORTEGA's drug couriers. In the course of a single day, the defendants' Delivery Service caused the deaths of three unrelated victims in Manhattan by selling the victims purported cocaine that was, in fact, laced with fentanyl.

Julia Ghahramani's Overdose Death

b. On or about March 18, 2021, Julia Ghahramani was found unresponsive in her Manhattan apartment. Law enforcement and emergency medical personnel responded to the scene, where Ghahramani was pronounced dead. Members of the NYPD observed approximately three translucent black baggies, two of which were empty and one of which contained a white powdery substance on a plate on the kitchen counter in the apartment. A credit card and a rolled-up piece of paper with white residue were also on the plate.

c. Residues from one of the baggies and from the rolled-up paper were tested by the NYPD Controlled Substance Analysis Section (the "NYPD Lab"), which detected fentanyl and cocaine on the rolled-up paper and cocaine in the baggie.

d. Consistent with the drugs found at the scene, the medical examiner found that Ghahramani died from acute intoxication by the combined effects of fentanyl, acetylfentanyl, and cocaine.

e. Ghahramani's cellphone (the "Ghahramani Cellphone") was recovered from her apartment.

f. In addition, responding NYPD officers obtained camera stills from the doorbell camera associated with Ghahramani's apartment building, including the below doorbell still from on or about March 17, 2021, the day before Ghahramani's body was found:



g. Surveillance video from the apartment building's elevator shows that the same individual depicted in the doorbell still (the "Fatal Courier") proceeded to take the elevator to a higher floor, exit, and then, approximately twenty seconds later, return to the elevator. A still of the Fatal Courier in the elevator is shown below:



Ross Mtangi's Overdose Death

h. On or about March 18, 2021, Ross Mtangi was found unresponsive in a Manhattan hotel room. Law enforcement and emergency medical personnel responded to the scene, where Mtangi was pronounced dead. I was among the NYPD officers who responded to Mtangi's hotel room. Members of the NYPD and I observed approximately seven translucent black baggies on a table in the hotel room. Several of the baggies were empty, whereas others contained a white powdery substance. Nearby the baggies were lines of a white powdery substance, a hotel card, a rolled-up \$20 bill, and malt beverages.

i. Residues from one of the baggies and the \$20 bill were tested by the NYPD Lab, which detected fentanyl and cocaine on the \$20 bill and cocaine in the baggie.

j. Consistent with the drugs found at the scene, the medical examiner found that Mtangi died from acute intoxication by the combined effects of fentanyl, cocaine, and ethanol.

k. Surveillance videos from the hotel show that the Fatal Courier - wearing the same outfit visible in the surveillance video and doorbell stills from Ghahramani's apartment - visited Mtangi's hotel on or about March 17, 2021, the day before his body was found. Still images from the hotel's surveillance videos are shown below:



Amanda Scher's Overdose Death

l. On or about March 18, 2021, Amanda Scher was found unresponsive in her Manhattan apartment. Law enforcement and emergency medical personnel responded to the scene, where Scher was pronounced dead. I was among the NYPD officers who responded to Scher's apartment that day. I observed suspected cocaine on Scher's dresser and one translucent black baggie containing a powdery substance was recovered from Scher's top nightstand drawer.¹ I also observed a glass plate with a white powdery

¹ Prescription pills were also recovered from the coffee table.

substance in a line, a credit card, and a straw on top of a dresser in her bedroom.

m. The baggie contained fentanyl, as confirmed by NYPD Lab testing. The NYPD Lab also tested the straw's residue, and detected fentanyl and cocaine.

n. Consistent with the drugs found at the scene, the medical examiner found that Scher died from acute intoxication by the combined effects of fentanyl and cocaine.

o. Scher's cellphone (the "Scher Cellphone") was recovered from her apartment.

p. Surveillance video from the vicinity of Scher's apartment shows that the Fatal Courier - wearing the same outfit shown in the Ghahramani and Mtangi surveillance videos - visited Scher's apartment on or about March 17, 2021, the day before her body was found. A still image from this surveillance video is below:



The Drug Dispatcher Phone

7. Based on my review of the Ghahramani Cellphone and the Scher Cellphone, I have learned that Ghahramani and Scher each had text message conversations with a particular telephone number ending in 5555 (the "5555 Drug Dispatcher Phone") in which - based

on my training, experience, and involvement in this investigation - I believe that narcotics deliveries were arranged, including on or about March 17, 2021.²

The Ghahramani Cellphone

a. On or about March 17, 2021, Ghahramani and the 5555 Drug Dispatcher Phone had the following conversation over text:

Ghahramani: Hey

5555 Drug Dispatcher Phone: Hey was up

Ghahramani: Can u come thru? [. . .]

5555 Drug Dispatcher Phone: [. . .] I'll Send them right now if you want

Ghahramani: That would be great thank you really appreciate it
[The Ghahramani Apartment Address]

5555 Drug Dispatcher Phone: No worries we family

Ghahramani: 😊 Lmk the ETA when u can

5555 Drug Dispatcher Phone: Hey
10min

Ghahramani: 🎉 Can they come upstairs pls
Instead of me going to car

5555 Drug Dispatcher Phone: Hey yeah he's going up
10min

Ghahramani: Awesome

5555 Drug Dispatcher Phone: Hey
Hey you there

² The first text message on the Scher Cellphone between Scher and the 5555 Drug Dispatcher Phone occurred on or about January 20, 2020.

b. Based on my training, experience, and my involvement in this investigation, I believe that Ghahramani and the 5555 Drug Dispatcher Phone were discussing the delivery of the narcotics that resulted in her overdose death. In particular, Ghahramani asked for narcotics to be delivered ("can u come thru?"), and the 5555 Drug Dispatcher Phone responded that a drug courier will be dispatched ("Send them right now if you want"). After Ghahramani responded in the affirmative and provided her address, she asked for when the narcotics courier will be sent to her apartment ("Lmk [let me know] the ETA when u can"), and the 5555 Drug Dispatcher Phone responded "10min". Ghahramani then requested that the courier "come upstairs pl[ea]s[e]," and the 5555 Drug Dispatcher Phone responded "yeah he's going up."

c. Approximately nine minutes later, the Fatal Courier was captured buzzing up to Ghahramani's apartment via the doorbell camera associated with Ghahramani's apartment building, as shown in paragraph 6(f), above.

d. Approximately six hours later, the 5555 Drug Dispatcher Phone attempted to contact the Ghahramani Cellphone ("Hey / Hey you there"). Ghahramani never responded.³

The Scher Cellphone

e. On or about March 17, 2021, the Scher Cellphone and the 5555 Drug Dispatcher Phone had the following conversation over text.

Scher: Hey

5555 Drug Dispatcher Phone: Hi
Full address

Scher: Question first...is it the same as it was Sunday? Because that was not good lol, had to get rid of it

5555 Drug Dispatcher Phone: No new Bach
Batch

* * *

³ The Ghahramani Cellphone shows that, after the above texts, the Drug Dispatcher Phone made two phone calls to the Ghahramani Cellphone, but they went unanswered. The following morning, the 5555 Drug Dispatcher Phone again called the Ghahramani Cellphone approximately five times, but the calls went unanswered.

Scher: Walking from train

5555 Drug Dispatcher Phone: He's on the way

Scher: Thanks

5555 Drug Dispatcher Phone: Hey how's this batch

Scher: HAvnt tried yet, let you know in a few!
Def better

5555 Drug Dispatcher Phone: Hey try not to do too much because it's really strong
Hey boss lady you heard
Lol

f. Based on my training, experience, and my involvement in this investigation, including my review of additional text messages from the Scher Cellphone, I believe that Scher and the 5555 Drug Dispatcher Phone were discussing the delivery of the narcotics that resulted in her overdose death. In particular, "batch" or "batches" refers to narcotics. After Scher stated she was walking from the train to her apartment, the 5555 Drug Dispatcher Phone responded that the Fatal Courier was on the way ("He's on his way"). Approximately two hours later, after Scher indicated she had tried the drugs (the batch was "[d]ef better"), the 5555 Drug Dispatcher Phone cautioned Scher about the potency of the drugs ("try not to do too much because it's really strong"). Scher never responded.⁴

g. The 5555 Drug Dispatcher Phone was saved in the Scher Cellphone under the contact name "Jason Melissa," and that contact includes a second phone number, ending in 3122 (the "3122 Drug Dispatcher Phone").

⁴ The Scher Cellphone shows that, after the above texts, the Drug Dispatcher Phone made a series of three FaceTime audio calls to the Scher Cellphone, but they went unanswered. The following morning, the 5555 Drug Dispatcher Phone again texted Scher: "Hey can you give me a call back I need to ask you something real fast."

Defendant BILLY ORTEGA Is the Drug Dispatcher

8. For the reasons that follow, I believe that the user of the 5555 Drug Dispatcher Phone is BILLY ORTEGA, a/k/a "Jason," the defendant.

9. Based on my review of records from Apple, Inc., I have learned that two Apple iCloud accounts (the "iCloud Accounts") listed the 5555 Drug Dispatcher Phone as each iCloud account's two-factor authentication phone number. The Apple ID for one account began with "michlop812" (the "michlop812 iCloud") and the Apple ID for the other began with "kingbilly0812" (the "kingbilly0812 iCloud" and collectively the "iCloud Accounts").

The Drug Dispatcher is the User of the iCloud Accounts

10. I believe that the user of the 5555 Drug Dispatcher Phone is also the user of the michlop812 iCloud and the kingbilly0812 iCloud for reasons that include the following.

a. First, based on publicly available information regarding Apple iCloud's two-factor authentication feature, I have learned that access to or control over the 5555 Drug Dispatcher Phone would be required whenever the user of the iCloud Accounts logged into the iCloud Accounts from a new device. That is, in order to verify the iCloud Accounts' subscriber, a message would be sent to the 5555 Drug Dispatcher Phone to confirm that the iCloud Accounts' subscriber was the individual who was trying to access the iCloud Accounts.

b. Second, Apple's records show that the "day phone" number provided for the michlop812 iCloud is the 3122 Drug Dispatcher Phone.

c. Third, the kingbilly0812 iCloud's contents include records of iMessages with two of the fatal overdose victims – specifically, iMessages with a cellphone subscribed to by Mtangi⁵ and iMessages with the Scher Cellphone.

i. Notably, the number being used by the kingbilly0812 iCloud in these messages is the 3122 Drug Dispatcher Phone.

ii. Of further note, on or about January 20, 2020, the kingbilly0812 iCloud, using the number for the 3122 Drug

⁵ Based on my review of records from Verizon, I have learned that the cellphone is subscribed to in Mtangi's name.

Dispatcher Phone, received an iMessage from the Scher Cellphone stating "Hey." The message was read at approximately 8:03 PM. On the Scher Cellphone, the first texts from the 5555 Drug Dispatcher Phone were received on or about January 20, 2020, at approximately 8:04 PM, stating: "Hey how you doing Amanda Is me Jason pls delete 646-354-3122 [/] You txt the Wrong number."

The User of the iCloud Accounts is Defendant BILLY ORTEGA

11. I believe that BILLY ORTEGA, a/k/a "Jason," the defendant, is the user of the iCloud Accounts, and thus the user of the 5555 Drug Dispatcher Phone, for reasons that include the following.

a. I have reviewed a photograph from the michlop812 iCloud that is a screenshot of an iMessage conversation on an iPhone. The last text received in the conversation states: "Welp at least we know your phone is working well to forward my calls. We've had multiple conversations about your MINUTE responsibilities when it comes to [name of apparent minor child⁶] and you have yet to get a grasp on it. I mean WTF IS REALLY WRONG WITH YOU BILLY ORTEGA ?"

b. Based on my review of a credit bureau report for ORTEGA, I have learned that ORTEGA owes nearly \$65,000 in child support.

c. Based on my review of records and information for ORTEGA's account at a bank ("Bank-1"), I have learned the following:

i. The email address associated with ORTEGA's account at Bank-1 is the same email address beginning with kingbilly0812 that is the Apple ID for the kingbilly0812 iCloud.

ii. The mailing address associated with ORTEGA's account is an apartment in Manhattan - which, as shown in records from Apple, is the same building address associated with the michlop812 iCloud.

⁶ Earlier messages reference payments owed by ORTEGA for orthodontics and allowance for the apparent minor.

iii. In a recorded call, on or about September 10, 2021⁷, between ORTEGA and a bank employee in which ORTEGA inquires about increasing his credit limit, ORTEGA stated in sum and substance that he earned approximately \$80,000 annually, that his income is not subject to taxation,⁸ and that his monthly mortgage is approximately \$4,000.

iv. ORTEGA's online account at Bank-1 was accessed using a particular IP Address (the "ORTEGA IP Address").

d. Based on my review of records from Apple, I know that the ORTEGA IP Address was also used to access the kingbilly0812 iCloud.

e. Based on my review of records from the internet service provider for the ORTEGA IP Address, I have learned that the ORTEGA IP Address is subscribed to in the name of a woman whom I believe, based on my review of the kingbilly0812 iCloud, to be ORTEGA's significant other ("Individual-1"), at an address on Wooley Road in West Milford, New Jersey (the "Wooley Road Residence").

f. Based on my review of a publicly available website regarding New Jersey real property, I have learned that Individual-1 is the owner of the Wooley Road Residence, which Individual-1 purchased on or about September 18, 2020.

g. Based on my review of the kingbilly0812 iCloud, I have learned the following:

i. The kingbilly0812 iCloud, using the phone number 646-853-6897, engaged in text message conversations with a phone number ending in 7079 (the "7079 Cellphone"). On or about June 5, 2020, the kingbilly0812 iCloud texted: "Yo was good bro it's me Billz this is my new contact." On or about August 26, 2020, the kingbilly0812 iCloud texted: "I'm on the contract right now Purchasing a home." The kingbilly0812 iCloud thereafter sends the website for the listing of the Wooley Road Residence.

⁷ While there is no date given in the audio recording, during the call, ORTEGA made a payment to his credit card in the amount of \$2,000. Based on my review of ORTEGA's credit card statements with Bank-1, I have learned that the only \$2,000 payment to ORTEGA's credit card occurred on or about September 10, 2021.

⁸ ORTEGA claimed, in sum and substance, that he did not owe taxes because he operated a dog kennel.

ii. The kingbilly0812 iCloud, using the phone number 646-853-6897, engaged in text message conversations with a phone number ending in 7236 (the "7236 Cellphone"). On or about June 20, 2020, the kingbilly0812 iCloud texted the 7236 Cellphone to "save this # delete the old one." The 7236 cellphone replied, asking "[Individual-1's first name] or billy ?" The kingbilly0812 iCloud responded: "Billz."

Defendant KAYLEN RAINES Is the Fatal Courier

12. I believe that KAYLEN RAINES, the defendant, is the Fatal Courier, for reasons that include the following.

a. Based on my review of NYPD records, I have learned that RAINES and ORTEGA were arrested for allegedly committing a robbery together in or about November 2016.

b. Based on my review of payment records for the 5555 Drug Dispatcher Phone obtained from that phone's service provider, I have learned that, on or about February 16, 2021, service for the 5555 Drug Dispatcher Phone was paid for by a VISA debit card in the name of "Kaylen Rainey."

c. Based on my analysis of toll records for the 5555 Drug Dispatcher Phone, I have learned that the Ghahramani Cellphone communicated with the Drug Dispatcher Phone on February 22, 2021; February 23, 2021; March 9, 2021; and March 17, 2021 (the last date being one day before Ghahramani was found dead). On the three most recent of those dates – i.e., all but February 22, 2021 – the Drug Dispatcher Phone also communicated multiple times with a phone number ending in 5039 (the "5039 Phone").

d. Based on my review of records obtained from a law enforcement database, I have learned that the 5039 Phone is associated with KAYLEN RAINES, the defendant, from data pulled from two credit bureaus. In addition, based on my review of NYPD records, I have learned that, according to those records, RAINES provided the 5039 Phone as his phone number while being processed at Manhattan central booking in connection with his arrest with ORTEGA in or about November 2016.

e. Based on my preliminary review of cellsite location information for the 5039 Phone, I have learned that the 5039 Phone was located in the vicinity of Ghahramani's Building, Scher's building, and Mtangi's hotel room at around the times that the Fatal Courier is seen on surveillance videos at those locations on or about March 17, 2021.

f. Based on my review of the still photographs obtained from the doorbell camera associated with Ghahramani's apartment building referenced in paragraphs 6(f)-(g), above (the "Doorbell Stills"), I have observed that the Fatal Courier depicted in the doorbell still and elevator surveillance photograph referenced in those paragraphs, also appeared to enter Ghahramani's building on each of the days that Ghahramani communicated with the 5555 Drug Dispatcher Phone. Still photographs of the Fatal Courier on each of these days are shown below:



February 22, 2021



February 23, 2021



March 9, 2021



March 17, 2021

g. I have reviewed photographs of RAINY, including his New York Department of Motor Vehicle ("DMV") photograph and photographs that were publicly posted to the Facebook page using the name "Kaylen Rainey."⁹ Two of these photographs are reproduced below:

⁹ Based on my review of records obtained from Facebook, I have learned that this Facebook page is subscribed to Kaylen Rainey and lists the 5039 Phone as its "verified phone number."



Facebook Photo (Cropped)



DMV Photo

h. Based on my comparison of the Doorbell Stills to the photographs immediately above of RAINY, as well as the call records, cellsite location data, and payment information for the 5555 Drug Dispatcher Phone, I believe that the Fatal Courier is RAINY.

Defendant WILLIAM DRAYTON Is a Drug Courier

13. I believe that WILLIAM DRAYTON, the defendant, is a drug courier for the Delivery Service, for reasons that include the following.

a. Based on my review of call detail records for the 5555 Drug Dispatcher Phone, I have learned the following.

i. The 5555 Drug Dispatcher Phone has frequently been in contact with the cellphone assigned a call number ending in 2481 (the "2481 Phone").

ii. On or about March 18, 2021 – that is, the day that the three Victims were found dead of apparent drug overdoses after receiving a delivery the day before – the 5555 Drug Dispatcher Phone called the Scher Cellphone and the Ghahramani Cellphone. Both calls went unanswered. The Drug Dispatcher Phone then called the 2481 Phone.

b. From my review of the kingbilly0812 iCloud, I have reviewed an iMessage conversation between the kingbilly0812

iCloud, using phone number 646-853-6897, and the 2481 Phone, in which addresses and apparent deliveries are discussed.

c. Based on my review of NYPD records, I have learned that DRAYTON provided the 2481 Phone's number to the NYPD in connection with his arrest on or about July 7, 2020. DRAYTON was arrested on or about that date for allegedly breaking the door handle on the car of his girlfriend, with whom he shares children. Based on my review of additional NYPD records, I have learned that DRAYTON's girlfriend has a white Jeep Grand Cherokee registered in her name (the "White Cherokee").

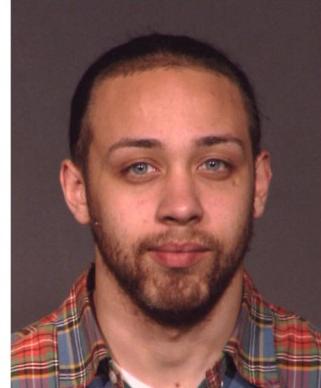
d. Based on my review of the Scher Cellphone, I have learned that the 5555 Drug Dispatcher Phone texted the Scher Cellphone to look for a "White Cherokee" in connection with multiple apparent drug deliveries. For example, on or about November 6, 2020, after arranging a delivery and texting about timing, the 5555 Drug Dispatcher Phone texted the Scher Cellphone: "Hey come on white Cherokee." As another example, on or about December 17, 2020, again after arranging a delivery and texting about timing, the 5555 Drug Dispatcher Phone texted the Scher Cellphone: "Hey come down [/] White Cherokee."

e. Based on my review of license plate reader ("LPR") records for the White Cherokee on or about December 17, 2020, I have learned that the White Cherokee was recorded entering Manhattan from Brooklyn via the Brooklyn Bridge at approximately 9:30 p.m. Based on my review of travel times on Google Maps, the White Cherokee could have driven to the vicinity of Victim-1's apartment by the time – approximately 9:39 p.m. – that the Drug Dispatcher Phone texted Victim-1 to "come down [/] White Cherokee."

f. Based on my review of the Scher Cellphone, I have also learned that, on or about October 8, 2020, the Drug Dispatcher Phone texted the Scher Cellphone to look for a "White kid with glasses" in connection with an apparent drug delivery.

g. Based on my review of the Doorbell Stills from the Ghahramani Building, I have learned that on or about February 18, 2021, at approximately 3:44 p.m. and 3:45 p.m., a white male with glasses is shown ringing Ghahramani's doorbell.

h. I have compared the images of the unmasked individual who rang Ghahramani's doorbell (below left) with an arrest photograph of DRAYTON (below right), and believe the individual at Ghahramani's door and DRAYTON to be one and the same person.



i. Based on my review of call detail records for the Drug Dispatcher Phone, I know that, on or about February 18, 2021, at approximately 3:30 p.m. – that is, approximately 15 minutes prior to DRAYTON's ringing Ghahramani's doorbell – the 2481 Phone called the Drug Dispatcher Phone.

14. Based on the foregoing, I believe that WILLIAM DRAYTON, the defendant, was acting as a drug courier for the drug delivery conspiracy, at times using the White Cherokee to make drug deliveries.

* * *

WHEREFORE the deponent respectfully requests that warrants be issued for the arrests of BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINES, and WILLIAM DRAYTON, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

S/ Samantha Gill /otw

SAMANTHA GILL
Detective
New York City Police Department

Sworn to me through the transmission of this Affidavit by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3), this 27th day of January 2022

THE HONORABLE QNA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK